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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**LAURA HANSON,**

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE  
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S OBJECTIONS TO  
DEFENDANT'S PROPOSED VOIR  
DIRE**

Plaintiff objects to Defendant's proposed voir dire as follows:

1. Doctrinal

No objection to Questions 1 and 2.

Plaintiff objects to Question 3. This implies that if the jury has sympathies that align with the law, they are impermissible, which is not the case. It also draws a distinction that is without basis, implying that a bias against someone who is harmed is “objective,” while following the law to provide compensation for someone who was harmed is “subjective.” Research shows that the concept of “objectivity” is a function of dominant culture, and people are pre-disposed to believe that the dominant culture is “objective” or “normal.” *See, e.g. Eric Luis Uhlmann and Geoffrey L. Cohen, “‘I think it, therefore it is true’: Effects of self-perceived objectivity on hiring discrimination,” ScienceDirect, Vol. 104, Issue 2, 207-223, 208 (Nov. 2007)* (“When people believe that they are objective, they feel licensed to act on biases whose influence they may have otherwise suppressed due to personal and social inhibitions.”). While much of this research has been done related to gender and race-based discrimination, in this case it tends to foster impermissible bias, which may exist in jurors, that able-bodied people are the objective norm and therefore more favorable than people with disabilities.

There is no evidence that jurors need to set aside sympathies in order to follow the law.

Regarding Question 4, Plaintiff does not generally object, but asks that if the Court explores the question Defendant proposes, the Court also explore whether jurors hold bias against cases that go to trial.

No objection to Question 5.

2. Legal Experience

Question 6 seems redundant to Question 2.

No objection to Questions 7 or 8.

3. Personal

No objection to Question 9-11.

4. Professional/Attitudinal

No objection to Questions 12 or 13.

Regarding Question 14, no objection, but Plaintiff asks that the Court equally ask whether the jury can be fair to Plaintiff or Defendant.

No objection to Questions 15-18.

Question 19 is vague and unclear. It should be rephrased.

No objection to Questions 20-27.

Regarding Question 28, it seems difficult to answer and likely to miss relevant answers. Plaintiff suggests rephrasing to say, "Have you ever suspected or heard of someone falsely claiming they were harassed in the workplace to get money?" Plaintiff also asks that there be follow up questions regarding the circumstances of that suspected behavior, including questions along the lines of:

"How many of you believe it is important for people who have broken the law to be held accountable?"

"How many believe differently?" "Why?"

"What do you think are appropriate ways to hold someone accountable?"

"Is money ever an appropriate way to hold someone accountable?"

"Do you ever think it is appropriate for an employer to be required to pay money to an employee because the employer broke the law?" Why or why not?

What do jurors value in their lives? For example, sometimes people value time with family, outdoors, work, hobbies, telephone calls with their friends, or religious or spiritual activities. The jury will be asked to compensate Plaintiff for emotional experiences, stress, loss of experiences and relationships she valued, and other experiences that do not have receipts. Will they be able to do that?

Submitted this 25th Day of April, 2024.

/s/ Rebecca Cambreleng

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## **CERTIFICATE OF SERVICE**

I certify that on April 25, 2024, I served the foregoing **PLAINTIFF'S OBJECTIONS TO DEFENDANT'S PROPOSED VOIR DIRE** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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